

**SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH
COMPLIANCE ASSESSMENT**

TO: Karen G. J'Anthony, Environmental Program Manager I, SHWMB *KGJA 7/31/08*
FROM: Melissa A. Ferree, Engineer II, SHWMB *MAF 7/29/08*
DATE: July 28, 2008
SUBJECT: Compliance Assessment at Procino Plating
REFERENCE: DED982362543, FILE CODE: 21

GENERATOR/TSD LOCATION ADDRESS: 901 South Market Street
Seaford, Delaware 19973

GENERATOR/TSD MAILING ADDRESS: 901 South Market Street
Seaford, Delaware 19973

SHWMB REPRESENTATIVES: Melissa A. Ferree and Bruce B. Cole

SITE REPRESENTATIVE: Rita Procino, Administrator
Doug Andrew, Operator

DATE OF ASSESSMENT: July 1, 2008

PURPOSE OF ASSESSMENT: Follow-up Inspection (FUI)

CURRENT FACILITY STATUS: LQG

NOTIFIED FACILITY STATUS: LQG

PRE-ASSESSMENT SAFETY PREPARATION:

Prior to the site visit, hazardous waste manifests were reviewed. On the basis of the manifest review, it was determined that the facility was a LQG.

It was determined that the safety equipment of hard hats, steel toed boots and safety glasses would be adequate under normal operating conditions at the site.

FACILITY DESCRIPTION/SITE OBSERVATIONS:

At the request of EPA Region III, SHWMB representatives performed a follow-up compliance assessment at Procino Plating. EPA Region III had previously conducted a compliance assessment on December 13, 2007 and a follow-up compliance assessment on February 5, 2008.

At the time of the assessment, SHWMB representatives observed that as a result of the previous compliance assessments, the facility had put into service a container for the collection of empty aerosol cans. This container was labeled "Aerosol Cans Only" and was located in the front shop (Photograph 1). No violations were observed in this area.

At the time of the assessment, SHWMB representatives observed that as a result of the previous compliance assessments, the facility had put into service two (one 4-ft. and one 8-ft.) fiber containers for the accumulation of spent fluorescent lamps. These containers were labeled with the words "Waste Lamps" and were closed. Procino Plating has contracted with Safety Kleen to dispose of the spent fluorescent lamps when needed (Photograph 2). No violations were observed in this area.

In the Wastewater Treatment (WWT) System room located in Building 2, SHWMB representatives observed a large metal hopper containing a supersack of F006 WWT sludge. This container was labeled with the words "Hazardous Waste," dated May 23, 2008 and closed (Photographs 3 and 4). No violations were observed in this area.

In the area across from the WWT system, SHWMB representatives observed that the drums of nickel stripper and zinc plating solution that had been observed during the two previous compliance assessments were no longer being accumulated. Mrs. Procino explained that these drums had been managed as non-hazardous waste through Lowcountry Environmental Services and provided both a manifest and bill to confirm (Attachment 2).

SHWMB representatives also observed that the 3 – 55 gallon drums labeled "Cyanide Water from Floor," 2 – 300 gallon totes of cyanide rinse water, and 10 -55 gallon drums of hydrochloric acid and water that had been observed during the two previous compliance assessments were no longer being accumulated. Mrs. Procino and Doug Andrew explained that these drums had been treated in the facility's on-site WWT system.

SHWMB representatives observed four – 55 gallon drums containing brass cyanide plating bath solution. Mr. Procino stated in previous compliance assessments that this material was removed from the brass plating bath tank. Spent cyanide plating bath solutions from electroplating operations are considered a listed hazardous waste carrying the waste code F007. One drum was labeled "cyanide to be treated." Another was labeled "No good – to be treated." None of these containers were labeled with the words "Hazardous Waste" or marked with an accumulation start date (Photographs 5, 6, and 7).

This is a violation of Delaware's *Regulations Governing Hazardous Waste* §262.34(a)(3), which states:

"...a generator may accumulate hazardous waste on-site for 90 days or less without a permit...provided that:...While being accumulated on-site, each container and tank is labeled or clearly marked with the words 'Hazardous Waste.'"

This is also a violation of Delaware's *Regulations Governing Hazardous Waste* §262.34(a)(2), which states:

"...a generator may accumulate hazardous waste on-site for 90 days or less without a permit...provided that:...The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container."

SHWMB representatives observed four – 55 gallon drums containing tin cyanide plating solution. During the February 5, 2008 follow-up compliance assessment, Mr. Procino stated that these drums should have been taken by Fin-Tec on January 9, 2008, as Procino Plating has no use for them. As it is clear that Fin-Tec does not want these drums (since they didn't take them on January 9, 2008 and have remained at Procino Plating for six months) and Procino Plating has no use for them because Mr. Procino stated they have removed their barrel plating line and no longer have a need for this solution, these drums contain a waste. Spent cyanide plating bath solutions from electroplating operations are considered a listed hazardous waste carrying the waste code F007. None of the drums were labeled with the words "Hazardous Waste" or marked with an accumulation start date. This is a violation of Delaware's *Regulations Governing Hazardous Waste* §262.34(a)(3), which states:

"...a generator may accumulate hazardous waste on-site for 90 days or less without a permit...provided that:...While being accumulated on-site, each container and tank is labeled or clearly marked with the words 'Hazardous Waste.'"

This is also a violation of Delaware's *Regulations Governing Hazardous Waste* §262.34(a)(2), which states:

"...a generator may accumulate hazardous waste on-site for 90 days or less without a permit...provided that:...The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container."

By failing to meet the conditions of the exclusion for 90 day or less storage under DRGHW §262.34(a) as described above, Procino Plating is operating a hazardous waste storage facility without first obtaining a permit. By not obtaining a permit, Procino Plating is in violation of DRGHW §122.1(c), which states in part:

"DNREC requires a permit for the 'treatment', 'storage', and 'disposal' of any 'hazardous waste' as identified or listed in Part 261."

In addition to the drums of tin plating bath solution not being labeled or dated, at the time of the assessment, these drums had been accumulated on-site for at least 146 days (as they were observed by SHWMB and EPA representatives on February 5, 2008 and again by SHWMB representatives on July 1, 2008). This is a violation of DRGHW §122.1(c), which states:

"DNREC requires a permit for the 'treatment', 'storage', and 'disposal' of any 'hazardous waste' as identified or listed in Part 261."

The multiple containers documented in each previous inspection report were still being accumulated on-site. Previously, Mr. Procino had said these containers needed to be "gone through" to determine if the material was usable product or a waste. It was unclear at the time of the assessment if this had been done. In addition, the facility had moved everything from the small chemical store room in the back of the building to the area across from the WWT system (Photographs 8, 9, and 10).

SHWMB representatives observed four newly generated drums of hydrochloric acid and water that facility representatives stated had become waste the previous week. Mr. Procino stated during the February 5, 2008 follow-up compliance assessment that this waste stream had a pH of approximately 1. Because the pH of this waste stream is below 2, it is considered a characteristic hazardous waste carrying the waste code D002 (as defined in DRGHW §261.22). At the time of the assessment, these drums were not labeled with the words "Hazardous Waste" or marked with an accumulation start date on the container (Photograph 11).

This is a violation of Delaware's *Regulations Governing Hazardous Waste* (DRGHW) §262.34(a)(3), which states:

"...a generator may accumulate hazardous waste on-site for 90 days or less without a permit...provided that:...While being accumulated on-site, each container and tank is labeled or clearly marked with the words 'Hazardous Waste.'"

This is also a violation of DRGHW §262.34(a)(2), which states:

"...a generator may accumulate hazardous waste on-site for 90 days or less without a permit...provided that:...The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container."

By failing to meet the conditions of the exclusion for 90 day or less storage under DRGHW §262.34(a) as described above, Procino Plating is operating a hazardous waste storage facility without first obtaining a permit. By not obtaining a permit, Procino Plating is in violation of DRGHW §122.1(c), which states in part:

"DNREC requires a permit for the 'treatment', 'storage', and 'disposal' of any 'hazardous waste' as identified or listed in Part 261."

SHWMB and EPA representatives had discussed the need to immediately properly label containers of waste hydrochloric acid and water during the February 5, 2008 compliance assessment. SHWMB representative Melissa Ferree spoke to Mr. Procino on the telephone on July 7, 2008. During this telephone conversation, Mr. Procino stated that he knew the wrong labels were placed on the drums and acknowledged that the drums should have be labeled with words "Hazardous Waste" and marked with an accumulation start date.

SHWMB representatives also observed 3 poly drums with the top cut off used to accumulate gold plating solution (one of which contained cyanide). A solid similar to kitty litter is added to solidify the material at some point before it is sent off-site for gold reclamation. One of these containers was labeled with the word "Cyanide" and the other two were labeled "Gold Reclamation" (Photographs 12, 13, and 14). Facility representatives stated that this material is shipped off-site to a recycler without a hazardous waste manifest. This is a violation of DRGHW §266.70(b), which states:

"Persons who generate, transport, or store recyclable materials that are regulated under this subpart are subject to the following requirements: ... (2) Subpart B of 262..."

DRGHW Part 262, Subpart B [specifically §262.20(a)] requires:

"A generator who transports, or offers for transportation, hazardous waste for offsite treatment, storage, or disposal must prepare a Manifest...according to the instructions included in the appendix to this part."

In addition, under the "Precious Metal Exemption" in §266.70, the facility must maintain records demonstrating the materials are not speculatively accumulated. The facility is unable to provide this documentation. This is a violation of DRGHW §266.70(c), which states:

"Persons who store recycled materials that are regulated under this subpart must keep the following records to document that they are not accumulating these materials speculatively (as defined in 261.1(c) of these regulations)

- (i) Records showing the volume of these materials stored at the beginning of the calendar year;*
- (ii) The amount of these materials generated or received during the calendar year; and*
- (iii) The amount of materials remaining at the end of the calendar year."*

Also, with regard to the four newly generated drums of hydrochloric acid and water, and the three poly drums of solidified gold plating solution containing cyanide awaiting precious metals recovery shown in photographs 11, 12 and 13, note the proximity of these containers of incompatible wastes. Also, there is no dike, berm or wall between the drums.

The drums of waste are subject to the requirements of DRGHW Part 265, Subpart I. As stored, these drums violate §265.177(c) of Subpart I which states:

"A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device."

[Comment: The purpose of this is to prevent fires, explosions, gaseous emissions, leaching, or other discharge of hazardous waste or hazardous waste constituents which could result from the mixing of incompatible wastes or materials if containers break or leak.]"

Too, as a large quantity generator of hazardous waste, Procino Plating is subject to the requirements of DRGHW § 265.31 titled "Maintenance and operation of facility." The storage of waste awaiting precious metals recovery is in open top drums, each having two open handles in the drum sides. This, as well as the proximity of acid waste in relation to the drums awaiting precious metals recovery violates the requirements of DRGHW §265.31 which states:

"Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment."

FACILITY RECORD REVIEW:

At the time of the assessment, Procino Plating representatives were able to provide a copy of manifests for all shipments since the February 5, 2008 follow-up compliance assessment. Two supersacks (1 cubic yard each) of F006 sludge were shipped off-site on May 29, 2008.

At the time of the assessment, Procino Plating representatives were unable to provide a copy of the facility's contingency plan. Mrs. Procino stated that the plan was at her home, where she was updating it. This is a violation of DRGHW §265.53, which states:

"A printed copy of the contingency plan and all provisions to the plan must be: (a) Maintained at the facility and made available immediately upon request."

At the time of the assessment, Procino Plating was unable to provide documentation showing that the contingency plan had been submitted to the local emergency response agencies. This is a violation of the DRGHW §265.53, which states:

"A printed copy of the contingency plan and all provisions to the plan must be: ... (b) Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. Documentation of written submission and receipt must be maintained at the facility."

In addition, EPA's March 25, 2008 Notice of Violation required Procino Plating to update their contingency plan to include arrangements with local authorities and a list of emergency equipment, its location and capability. In Procino Plating's April 8, 2008 response to the Notice of Violation, Mrs. Procino stated:

"The facility's 'Contingency Plan and Emergency Procedures' is currently being revised. Upon completion, copies will be sent to Blades Police Department, Blade Volunteer Fire Company, Seaford Police Department, Seaford Volunteer Fire Company, Sussex County EMS and Nanticoke Memorial Hospital."

Since the facility did not have a copy of their contingency plan on-site, SHWMB representatives asked if the information required in EPA's March 25, 2008 Notice of Violation had been added to the contingency plan. Mrs. Procino stated that she had not had time to make these changes required by EPA's Notice of Violation and that she was working on updating it. This is a violation of DRGHW §265.52(c), which states:

"The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services..."

This is also a violation of DRGHW §265.52(e), which states:

"The plan must include a list of all emergency equipment at the facility (such as fire extinguishing equipment, spill control equipment, communications and alarm system (internal and external), and decontamination equipment)... This list must be kept up to date. In addition, the plan must include the location and physical description of each item and a brief outline of its capabilities."

At the time of the assessment, Mrs. Procino was unable to provide a list of employees with their job titles and job descriptions. These are violations of DRGHW §265.16(d), which states:

"The owner or operator must maintain the following documents and records at the facility:

- (1) The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job..."*
- (2) A written job description for each position listed under paragraph (d)(1) of this section. This description may be consistent in its degree of specificity with description for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualification, and duties of facility personnel assigned to each position;"*

Mrs. Procino provided a sheet signed by the three employees responsible for hazardous waste management at Procino Plating indicating that each had received a printed copy of the two PowerPoint presentations ("Understanding Delaware's Requirements for the Proper Management of Hazardous Waste" and "Satellite Accumulation of Hazardous Waste") that SHWMB representatives had prepared and provided to Procino Plating to enhance their training program. These PowerPoint presentations were not intended to be the sole training program used by Procino Plating. Because this training was not conducted in a classroom or as on-the-job training, this is a violation of DRGHW §265.16(a)(1), which states:

"Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures that facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section."

Because this training was not directed by a person trained in hazardous waste management procedures, this is a violation of DRGHW §265.16(a)(2), which states:

"This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed."

The individual conducting the training must be trained in hazardous waste management and knowledgeable on the regulatory requirements and the specific hazardous waste issues at the facility. These PowerPoint presentations were a broad overview of the regulatory requirements for hazardous waste generators and were not designed to be specific to Procino Plating's operations. There are several specific regulatory requirements that Procino Plating is required to comply with that are not discussed in the two PowerPoint presentations including, but not limited to, exemptions regarding treating waste in an on-site wastewater treatment system, the precious metal exemption, and the associated regulatory requirements for each exemption.

OBSERVED VIOLATIONS

July 1, 2008

VIOLATION CITATION	VIOLATION DESCRIPTION
DRGHW, §262.34(a)(3)	Failure to label hazardous waste container
DRGHW, §262.34(a)(2)	Failure to place accumulation start date on hazardous waste container
DRGHW, §122.1(c)	Failure to obtain a permit (storage over 90 days)
DRGHW, §262.20(a)	Failure to prepare a manifest for a shipment of hazardous waste
DRGHW, §266.70(c)	Failure to maintain speculative accumulation documentation (Precious Metal)
DRGHW, §265.177(c)	Failure to separate incompatible wastes
DRGHW, §265.31	Failure to maintain facility in a manner to prevent a release
DRGHW, §265.53(a)	Failure to maintain a printed copy of contingency plan on-site
DRGHW, §265.53(b)	Failure to submit contingency plan to local authorities
DRGHW, §265.52(c)	Failure to include arrangements with local authorities in contingency plan
DRGHW, §265.52(e)	Failure to include a list of emergency equipment in contingency plan
DRGHW, §265.16(d)(1)	Failure to provide list of employees and job titles
DRGHW, §265.16(d)(2)	Failure to provide job descriptions
DRGHW, §265.16(a)	Failure to provide training

VIOLATIONS IDENTIFIED IN EPA'S NOTICE OF VIOLATION

December 13, 2007 and February 5, 2008

VIOLATION CITATION	VIOLATION DESCRIPTION
DRGHW, §262.11	Failure to make a hazardous waste determination
DRGHW, §262.34(a)(3)	Failure to label hazardous waste container
DRGHW, §262.34(a)(2)	Failure to place accumulation start date on hazardous waste container
DRGHW, §265.173(a)	Failure to maintain a closed container
DRGHW, §265.16	Failure to provide training
DRGHW, §265.16(d)(1)	Failure to provide list of employees and job titles
DRGHW, §265.16(d)(2)	Failure to provide job descriptions
DRGHW, §265.52(c)	Failure to include arrangements with local authorities in contingency plan
DRGHW, §265.52(e)	Failure to include a list of emergency equipment in contingency plan
DRGHW, §273.13(d)	Failure to collect universal waste lamps in a closed container
DRGHW, §273.14(e)	Failure to label universal waste lamp container

CONTINUING VIOLATIONS

December 13, 2007; February 5, 2008; and July 1, 2008

VIOLATION CITATION	VIOLATION DESCRIPTION
DRGHW, §262.34(a)(3)	Failure to label hazardous waste container
DRGHW, §262.34(a)(2)	Failure to place accumulation start date on hazardous waste container
DRGHW, §265.16	Failure to provide training
DRGHW, §265.16(d)(1)	Failure to provide list of employees and job titles
DRGHW, §265.16(d)(2)	Failure to provide job descriptions
DRGHW, §265.52(c)	Failure to include arrangements with local authorities in contingency plan
DRGHW, §265.52(e)	Failure to include a list of emergency equipment in contingency plan

RECOMMENDATIONS:

EPA Region III will receive and evaluate the findings of this follow-up compliance assessment.

KGJ: MAF: tcc
Procino Plating.doc

**Lowcountry Environmental Services**

158 Cox Street
Walterboro, SC 29488

Phone # 843-539-1495

Fax # 843-539-852

Invoice

Date	Invoice #
5/9/2008	00030

Bill To

Procino Plaing, Inc.
901 South Market Street
Blades, DE 19973
Rita Procino

PAID

Deal #	P.O. No.	Terms
11	verbal	COD

Quantity	Description	Rate	Amount
29	Nickel Stripper	80.00	2,320.00
6	Zinc Plating Solution	80.00	480.00
	12% Fuel Surcharge	336.00	336.00
kevin@lowcountryenv.com		www.lowcountryenv.com	Total \$3,136.00

EXPECT MORE FROM YOUR FUTURE WITH L.E.S. ON YOUR MIND.

**NON-HAZARDOUS
WASTE MANIFEST**

1. Generator ID Number

DED982362543

2. Page 1 of

3. Emergency Response Phone

302-875-7395

4. Waste Tracking Number

5. Generator's Name and Mailing Address

Procino Plating, Inc.
901 South Market Street
Blades, DE 19973

Generator's Site Address (if different than mailing address)

Generator's Phone: 302-629-0331

6. Transporter 1 Company Name

U.S. EPA ID Number

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Designated Facility Name and Site Address

Allied Waste - Carbon Limestone Landfill
8100 South State Line Rd
Lowellville, OH 44436

U.S. EPA ID Number

OH0987048212

Facility's Phone: 330-536-8013

~~50-00-04~~

9. Waste Shipping Name and Description

10. Containers

No.

Type

11. Total Quantity

12. Unit Wt./Vol.

1. Nickel Stripper Non Hazardous,
Non Regulated, L08785397

DM

29

G

2. Zinc Solution, Non Hazardous,
Non Regulated, L08785398

DM

6

G

3.

4.

13. Special Handling Instructions and Additional Information

1) L08785397

2) L08785398

14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Generator's/Officer's Printed/Typed Name

Signature

Month Day Year

Procino Plating, Inc. / Patrick H. Procino

Patrick H. Procino

05/19/05

15. International Shipments

☐ Import to U.S.

☐ Export from U.S.

Port of entry/exit:

Date leaving U.S.:

Transporter Signature (for exports only):

16. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name

Signature

Month Day Year

Jose Escrivel

Jose Escrivel

5/19/08

Transporter 2 Printed/Typed Name

Signature

Month Day Year

17. Discrepancy

17a. Discrepancy Indication Space

☐ Quantity

☐ Type

☐ Residue

☐ Partial Rejection

☐ Full Rejection

Manifest Reference Number:

17b. Alternate Facility (or Generator)

U.S. EPA ID Number

Facility's Phone:

17c. Signature of Alternate Facility (or Generator)

Month Day Year

18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a

Printed/Typed Name

Signature

Month Day Year

BY SIGNING THE FOLLOWING FORM I ACKNOWLEDGE THAT I HAVE RECEIVED INFORMATION,
INSTRUCTION AND/OR LITERATURE CONCERNING THE FOLLOWING AND THAT I UNDERSTAND THE
POLICY AS IT IS OUTLINED:

**Understanding Delaware's Requirements for the Proper
Management of Hazardous Waste
Satellite Accumulation of Hazardous Waste**

Pat Procino
PRINT NAME

Pat Procino
EMPLOYEE SIGNATURE

4/8/08
DATE

Doug Andrew
PRINT NAME

Doug Andrew
EMPLOYEE SIGNATURE

4-8-08
DATE

Nate Hedges
PRINT NAME

Nate Hedges
EMPLOYEE SIGNATURE

5/6/08
DATE

PRINT NAME

EMPLOYEE SIGNATURE

DATE

PRINT NAME

EMPLOYEE SIGNATURE

DATE

PRINT NAME

EMPLOYEE SIGNATURE

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EMPLOYEE SIGNATURE

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PRINT NAME

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EMPLOYEE SIGNATURE

DATE

PRINT NAME

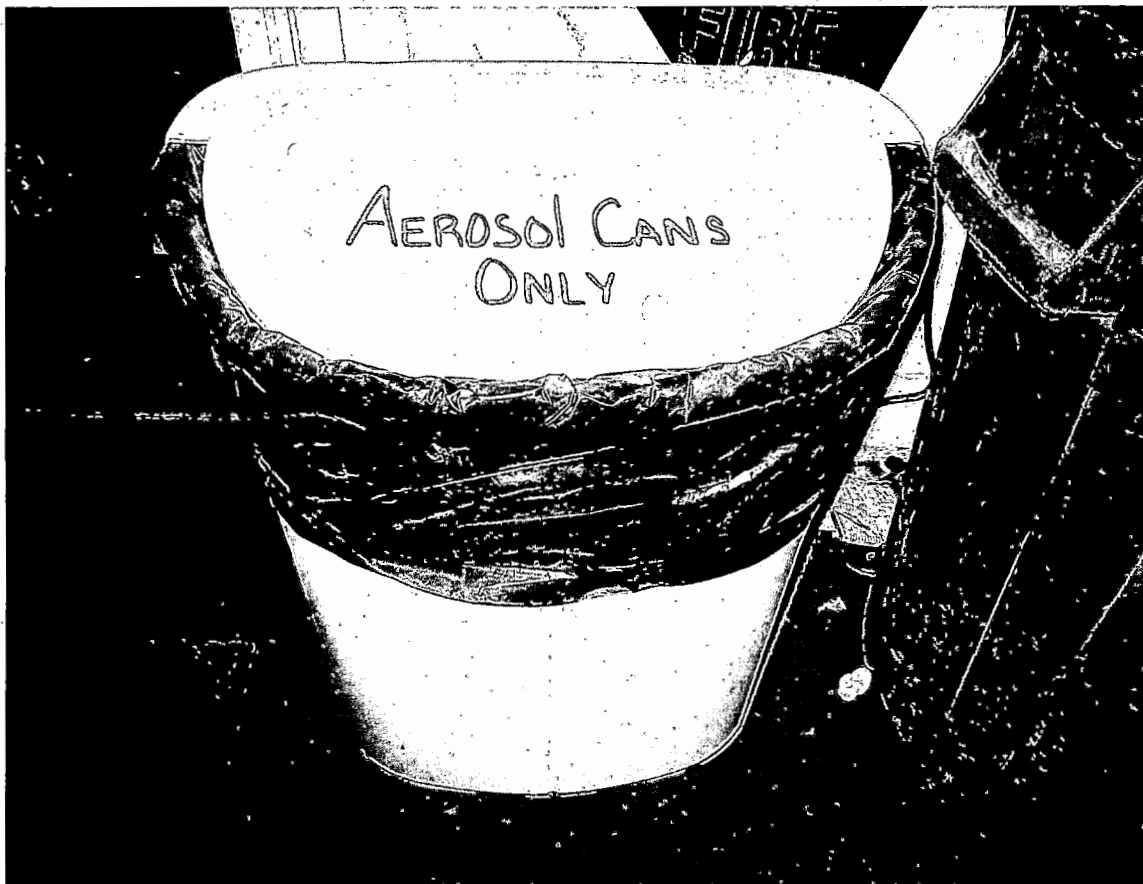
EMPLOYEE SIGNATURE

DATE

PRINT NAME

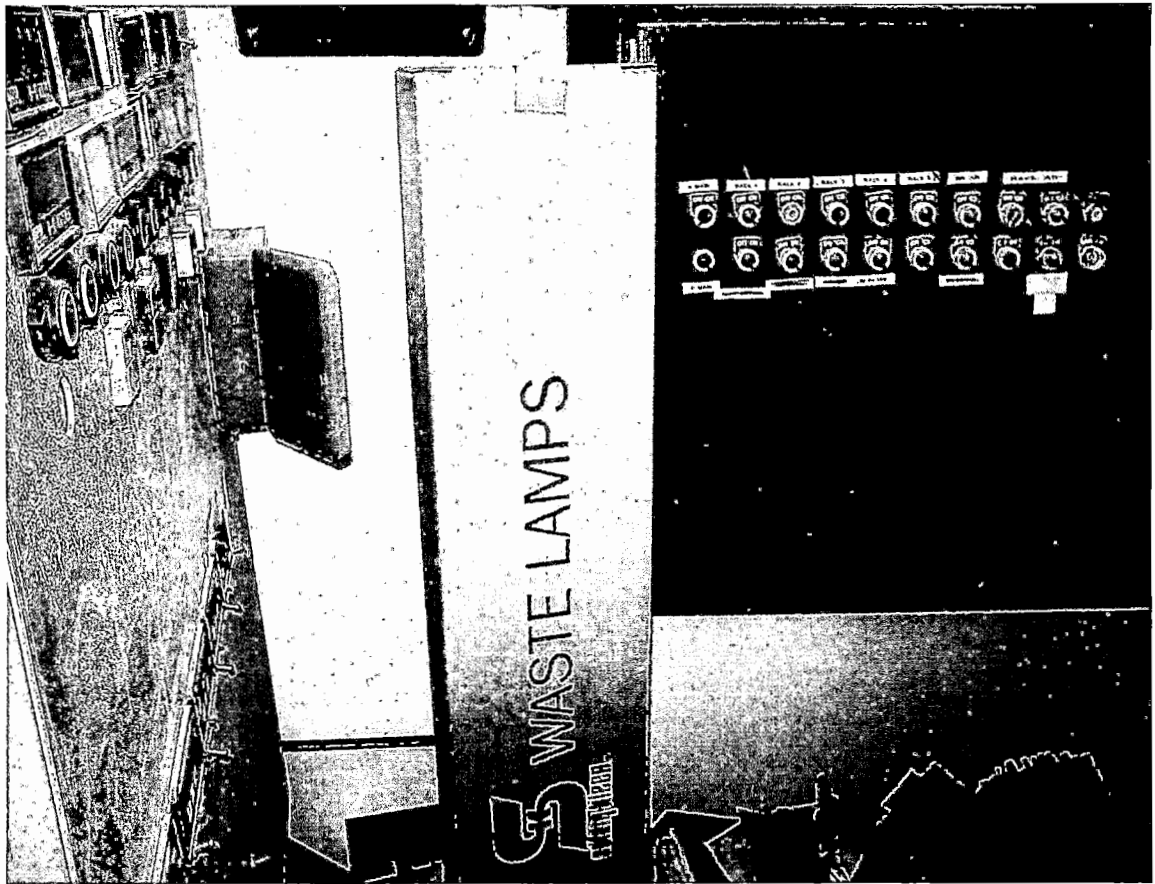
EMPLOYEE SIGNATURE

DATE



Photograph #1

✓ As a result of the December 13, 2007 and February 5, 2008 compliance assessment and follow-up compliance assessment, respectively, conducted by EPA Region III, Procino Plating put into service a container for the collection of empty aerosol cans.



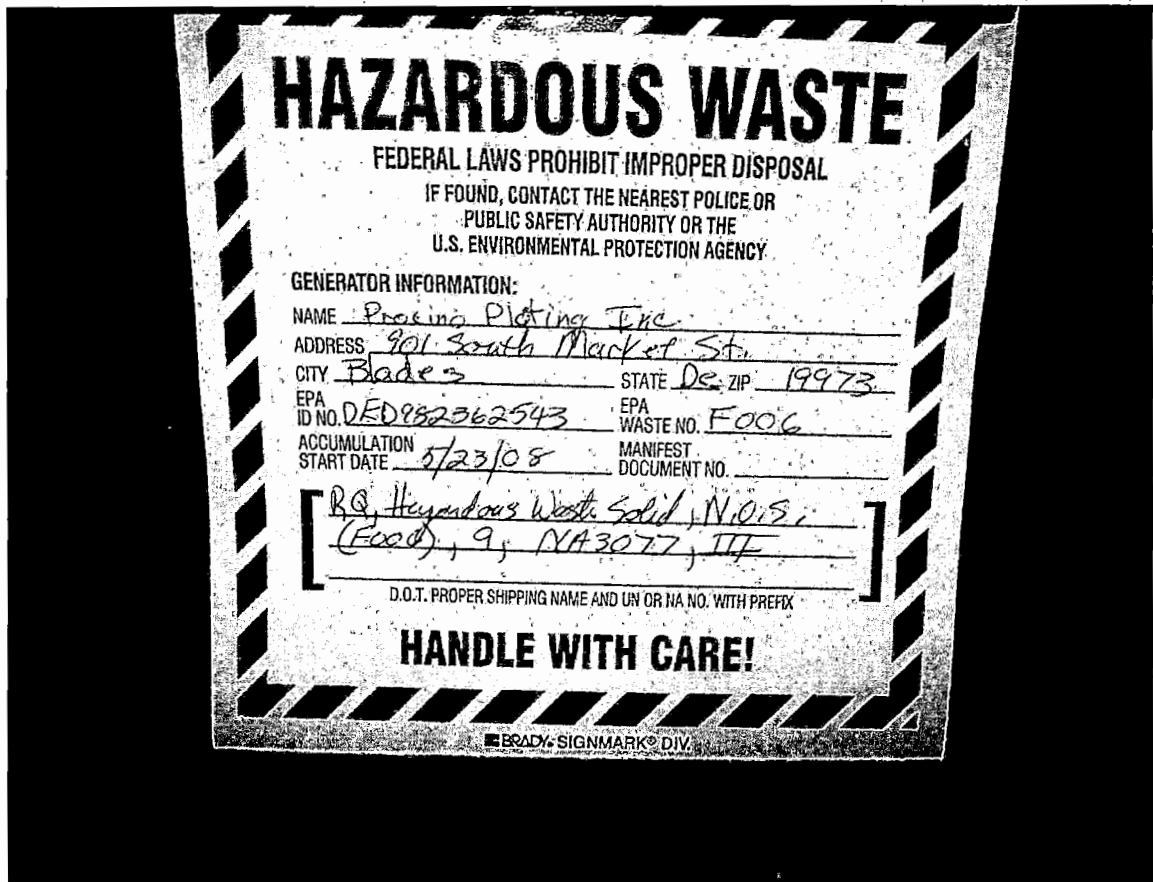
Photograph #2

As a result of the December 13, 2007 and February 5, 2008 compliance assessment and follow-up compliance assessment, respectively, conducted by EPA Region III, Procino Plating put into service a container for the collection of spent fluorescent lamps.



Photograph #3

In the Wastewater Treatment System room located in Building 2, SHWMB representatives observed a metal hopper utilized to accumulate F006 wastewater treatment plant sludge. As a result of the December 13, 2007 and February 5, 2008 compliance assessment and follow-up compliance assessment, respectively, conducted by EPA Region III, Procino Plating placed a plywood board on the container as a lid.



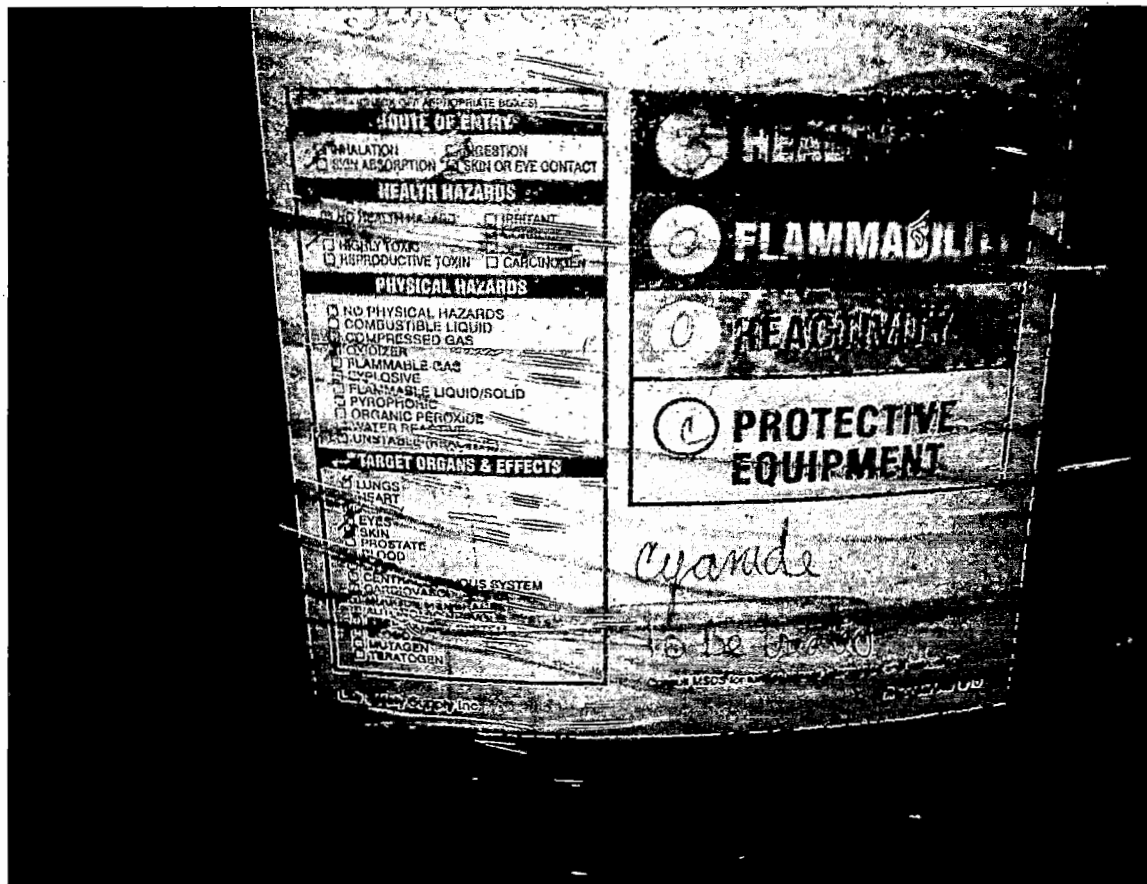
Photograph #4

In the Wastewater Treatment System room located in Building 2, SHWMB representatives observed a metal hopper utilized to accumulate F006 wastewater treatment plant sludge. This container was labeled with the words "Hazardous Waste" and marked with an accumulation start date. No violations were observed in this area.



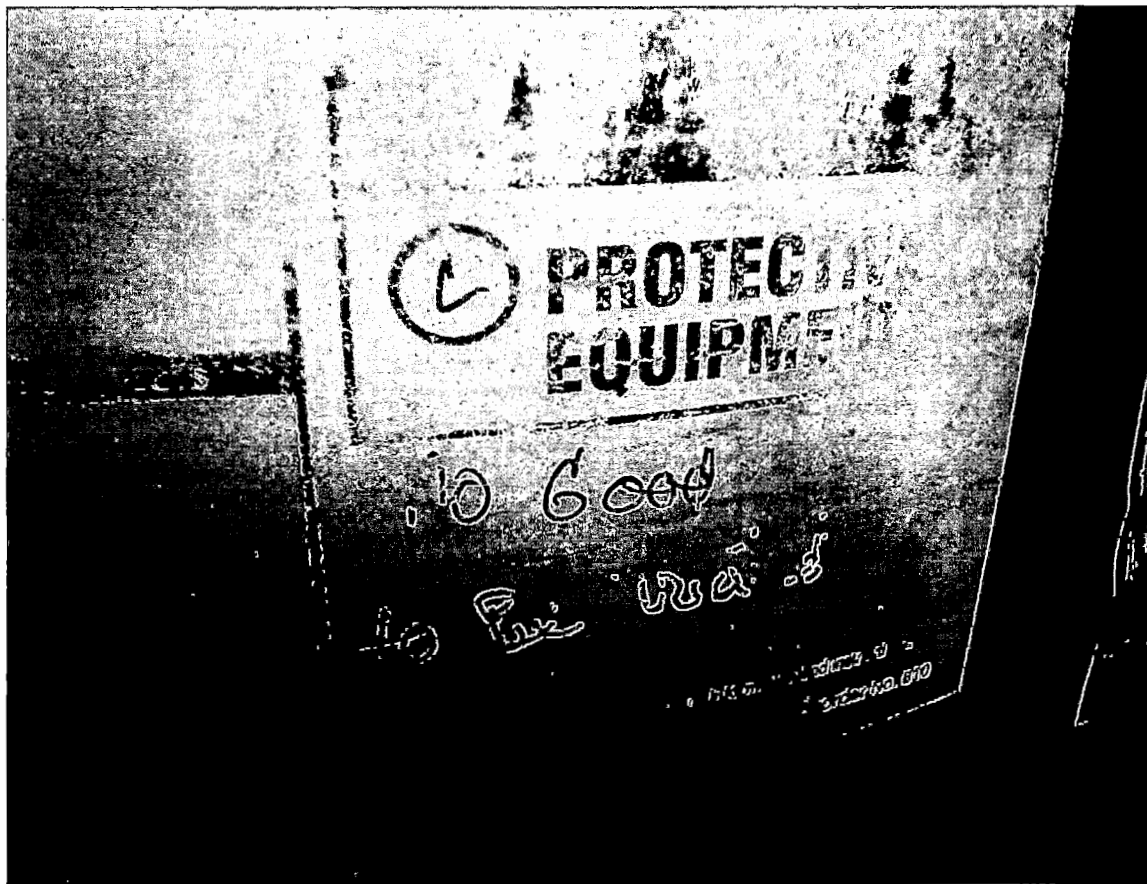
Photograph #5

SHWMB representatives observed four – 55 gallon drums containing brass plating solution in the aisle to the right. One drum was labeled “cyanide to be treated.” Another was labeled “No good – to be treated.” None of these containers were labeled with the words “Hazardous Waste” or marked with an accumulation start date.



Photograph #6

SHWMB representatives observed four – 55 gallon drums containing brass plating solution in the aisle to the right. This drum was labeled “cyanide to be treated.” Another was labeled “No good – to be treated.” None of these containers were labeled with the words “Hazardous Waste” or marked with an accumulation start date.



Photograph #7

SHWMB representatives observed four – 55 gallon drums containing brass plating solution in the aisle to the right. One drum was labeled “cyanide to be treated.” This drum was labeled “No good – to be treated.” None of these containers were labeled with the words “Hazardous Waste” or marked with an accumulation start date.



Photograph #8

SHWMB representatives observed multiple containers that had been present during the December 13, 2007 and February 5, 2008 compliance assessment and follow-up compliance assessment conducted by EPA Region III. Previously, Mr. Procino stated that these containers needed to be "gone through" to determine if the material was a usable product or waste.



Photograph #9

SHWMB representatives observed multiple containers that had been present during the December 13, 2007 and February 5, 2008 compliance assessment and follow-up compliance assessment conducted by EPA Region III. Previously, Mr. Procino stated that these containers needed to be “gone through” to determine if the material was a usable product or waste. The four – 55 gallon drums in the forefront of this photograph contained tin plating baths, which Mrs. Procino stated they didn’t want to dispose of in case they could still be used.



Photograph #10

SHWMB representatives observed multiple containers that had been present during the December 13, 2007 and February 5, 2008 compliance assessment and follow-up compliance assessment conducted by EPA Region III. Previously, Mr. Procino stated that these containers needed to be "gone through" to determine if the material was a usable product or waste.



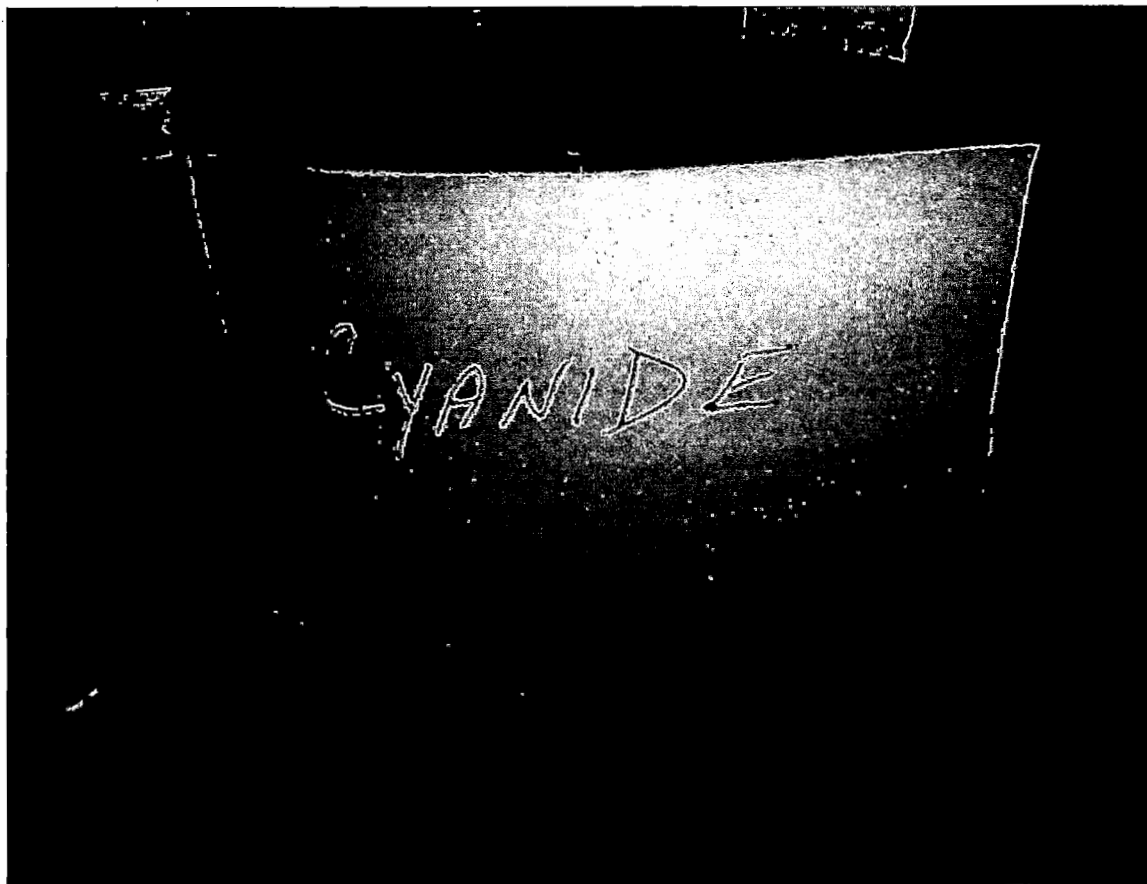
Photograph #11

SHWMB representatives observed four new 55 gallon drums of hydrochloric acid and waster (pH~1) that facility representatives stated had become waste the previous week. At the time of the assessment, these drums were not labeled with the words "Hazardous Waste" or marked with an accumulation start date.



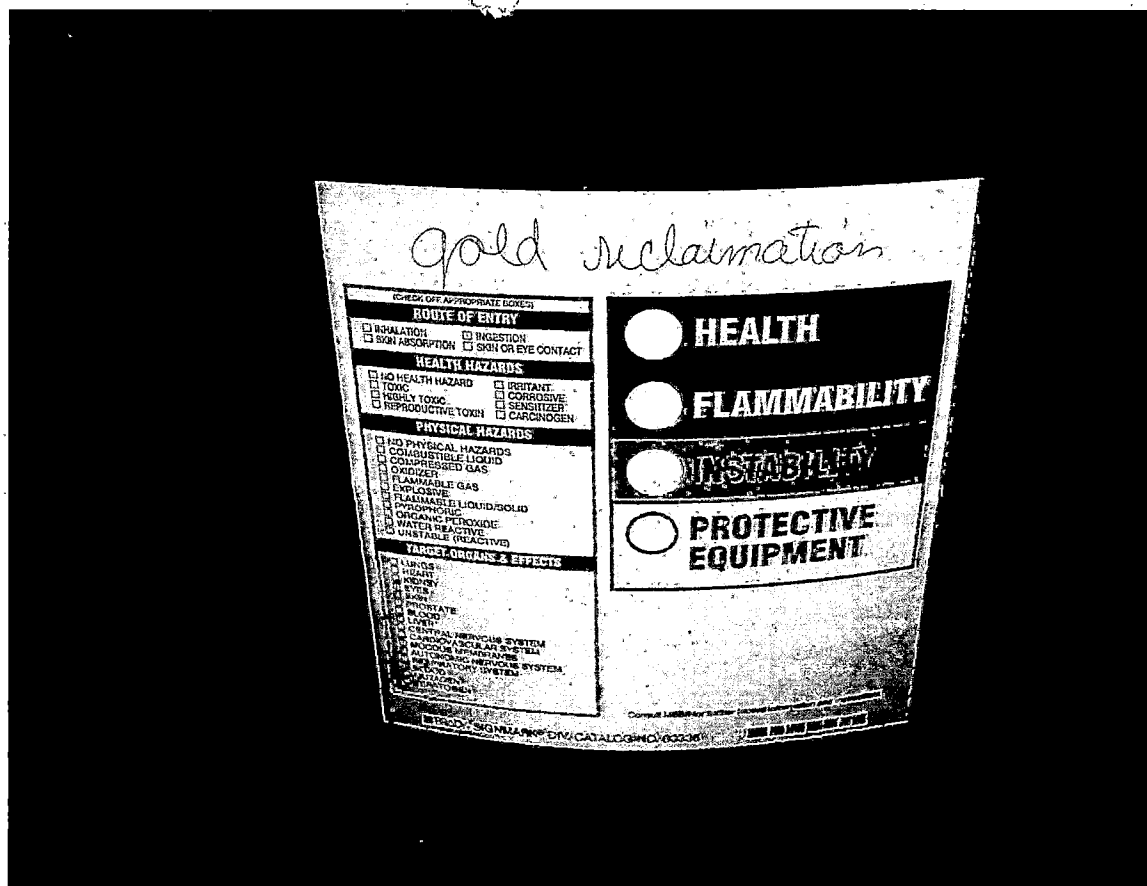
Photograph #12

SHWMB representatives observed 3 poly drums with the top cut off used to accumulate gold plating solution (containing cyanide). A solid similar to kitty litter is added to solidify the material at some point before it is sent off-site for gold reclamation. One of these containers was labeled with the word "Cyanide" and the other two were labeled "Gold Reclamation." Facility representatives stated that this material is shipped off-site to recycler without a hazardous waste manifest.



Photograph #13

SHWMB representatives observed 3 poly drums with the top cut off used to accumulate gold plating solution (containing cyanide). A solid similar to kitty litter is added to solidify the material at some point before it is sent off-site for gold reclamation. One of these containers was labeled with the word "Cyanide" and the other two were labeled "Gold Reclamation." Facility representatives stated that this material is shipped off-site to recycler without a hazardous waste manifest.



Photograph #14

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